ID#: TXD008063661

COMPANY: Lufkin Creosoting

Permit

DATE	ITEM	SECTION
Aug 18, 1980	Notification of Hazardous waste activity: Notified as a generator of kool, U051 and Toxic wastes	Notification
Aug 18, 1982	TDWR Inspection	Inspection
Sept. 29, 1982	TDWR interoffice memo – the inspection and violations	Insp.
Dec. 10, 1982	TDWR investigation Report	Insp.
Jan 10, 1983	Telephone memo (TDWR) Questions about enforcement action	Corr.
Jan 18, 1983	TDWR interoffice memo and Enforcement Notice	Enf.
Feb. 9, 1983	TDWR interoffice memo about E.N.	Enf.
March 15, 1983	TDWR letter to Lufkin to give results on the meeting in Feb. 2.	Corr.
May 2, 1983	TDWR interoffice memo about sample analysis on Lufkin	Insp.
May 25, 1983	TDWR Telephone memo to Lufkin to discuss meeting on June 28	Corr.
June 7, 1983	TDWR letter to Lufkin to confirm June 29th meeting.	Corr.
July 13, 1983	Conference record on meeting with Lufkin and the document Lufkin Submitted	Corr.
July 28, 1983	TDWR letter to Lufkin telling them they are in violation and have 60 days to comply. (Till Sept. 30, 1983)	Enf.
Nov. 28, 1983	TDWR Letter to Lufkin saying they haven't rec. the closure plan or any other documentation required by the Enf. letter.	Corr.
March 19, 1984	D+B Fin. Report	Fin.
March 29, 1984	EPA Record of Communication with TDWR, Notifying them of the CO sent out march 30, 1984 by EPA to Lufkin	Corr.
March 30, 1984	EPA Compliance Order sent to Lufkin	Enf.

File III A.

DUPLICATE?

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OCT 06 '82
ENFORCEMENT AND FIELD OPERATIONS

TEXAS DEPARTMENT OF WATER RESOURCES
Industrial Solid Waste Disposal Compliance Monitoring Inspection

Inspection Cover Sheet (see reverse side for checklist use and general instructions)

Compliant _____ Texas Permit/Reg. No. 31832

Noncompliant X (explain by separate memo) EPA I.D. No. TXD008063661

Site Operator Information:

Name of Company Lufkin Creosoting

Company's Address P.O. Box 1207
Lufkin, Tx 75901

Site Address 5 mi E. of Luffkin on Hwy 69

County Angelina

Type of Industry Creosoting (Pressure Treatment)

Indicate below Classes of Waste managed (Hazardous-H, Class I nonhazardous-NH, Class II-II)

Generator H, II Transporter _____ Small Quantity Generator Yes N/A No__

Treatment _____ Disposal _____ Storage _____ ; 90 Day Exemption Yes N/A No__

Site Information (T.S.D. facilities only)

1. Are facilities located outside the 100 year flood plain area? Yes ✓ No ___

2. Describe land use within one mile Undeveloped, Commercial, Agricultural

Inspection Information:

1. Inspectors Name & Title Tim Chaney Phone No. (713) 883-297

2. Inspection Date: 8/18/82

3. Inspection Participants: Danny Vines Phone No. (713) 634-5075

Approved: Clarence W Merritt Signed: Tim Chaney
District Supervisor Inspector

Date: 10/4/82

TDWR-(Changed 6/3/82, 90 Day Exemption Status added)

INDUSTRIAL SOLID WASTE

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OCT 07 '82

ENFORCEMENT AND FIELD OPERATIONS

Non-Major
Compliance Monitoring Inspection Report
Generators and Facilities Checklist

*335.10(b) & 335.64 (a), (b), & (c)

Section A - Manifest (Rule 156.22.01.110b)

1. Is the generator required to use the TDWR manifest? Yes ✓ No ____
2. Is the manifest properly completed? not observed see comments Yes ____ No ____

Note: If generator is a small quantity generator, manifesting is the only pretransport requirement.

*335.6(a-f) & 335.62

Section B - Hazardous Waste Determination (Rule 156.22.01.106(a-f) & 156.22.06.002)

1. On a copy of the registration, note generated solid waste(s) listed in Part 261 Subpart D with L (listed) and solid waste(s) that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity) with C (characteristic). See Attachment A
2. If notification or disposition of waste stream changes is not current, explain in comments sheet. see comments

*335.65-.69

Section C - Pretransport Requirements (Rule 156.22.06-.005-.009)

1. Does generator appear to have standard procedures for packaging, labeling and marking of hazardous waste? N/A Yes ____ No ____
2. Accumulation Time - (May accumulate hazardous waste for up to 90 days without a permit provided).
   a. If containers are used to temporarily store waste before transport, is each container clearly dated? Also, fill out rest of No. 2 (Accumulation Time) Yes ____ No ____
   b. Are containers labeled "Hazardous Waste" while being accumulated on-site? Yes ____ No ____
   c. Are containers inspteced for leakage or corrosion at least weekly? Yes ____ No ____
   d. Are containers holding ignitable or reactive waste located at 15 meters (50 feet) from the facility's property line? Yes ____ No ____

NOTE: 1. If tanks used, fill out checklist for tanks.
2. If generator accumulates waste on-site for less than 90 days, (has no TSD facilities) complete only Section H, J and K after Section E of this Checklist. A small quantity generator is exempt from these requirements, including Section C above, and all others after Section E.

*335.9, 335.70 -.72

Section D - Recordkeeping and Reports (Rule 156.22.01.109) 156.22.06.010-.012)

1. Does generator keep the required records and reports for 3 years? Yes ✓ No ____

** (indicates checklist questions which should be noted or completed at the time of an on-site inspection.)

Section E - General Facility Standards

1. Has proof of deed recordation of on-site disposal facilities been provided to the agency? Yes____ No V
2. Have there been any spills? none observed Yes____ No V
3. Have all spills been reported? Yes____ No____ N/A

NOTE: Attach a sketch of facilities. For all nonhazardous facilities do not complete the remainder of this Checklist. Use specific type facility checklists (from Group II form) and complete one checklist for each disposal facility.

Section F - Waste Analysis - Rule *335.114-.115 156.22.08.004 and .08.005

1. Does facility have an adequate waste analysis plan? Yes____ No V
2. Does the facility provide adequate security? Yes____ No V
3. Does the facility have a sign with the legend "Danger-Unauthorized Personnel Keep Out? (unless exempt)? Yes____ No V

Section G - General Inspection Requirements - Rule *335.116 156.22.08.006

1. Does facility have an adequate written inspection schedule (and plan)? Yes____ No V
2. Does the owner/operator maintain an inspection log? Yes____ No V

Section H - Personnel Training - Rule *335.117 156.11.08.007

1. Does the owner/operator maintain adequate Personnel Training Records at the facility? Yes____ No V

Section I - Requirements for Ignitable, Reactive or Incompatible Waste - Rule *335.118 Appendix IV of 335.48,335.242 156.22.08.008, Appendix IV of .05., and .15.002

1. Is the owner/operator familiar with proper separation and safeguards needed to prevent ignition or reaction of ignitable or reactive waste? Yes____ No V
2. Inspect containers:
   a. Has owner transferred waste from all containers leaking, bulging, or corroding? Yes____ No N/A

Section J - Preparedness and Prevention - Rule *335.131 - .137 156.22.09.001-.007

1. Does the owner/operator have phone numbers of and agreements with police, fire departments, emergency reponse teams, emergency response contractors and equipment suppliers, as appropriate? Yes____ No V
   a. Are they readily available to the emergency coordinator? Yes____ No V

Section K - Contingency Plan & Emergency Procedures - Rule *335.151 - .157 156.22.10.001-.007

1. Is an adequate contingency plan maintained at the facility? Yes____ No V

Section L - Manifest System, Recordkeeping and Reporting - Rule 335.171-.177 and 335.211-.220

1. If facility receives waste from off-site, does the owner/operator comply with manifest requirements? Yes ___ No ___ N/A

2. Does the owner/operator keep an adequate written operating record(s) at the facility? Yes ___ No ✓

3. Does the owner/operator maintain an adequate closure plan for all facilities (See Note 2 page 6)? Yes ___ No ✓

4. Does the owner/operator maintain an adequate post closure plan for disposal facilities (See Note 2 page 6)? Yes ___ No ✓

Section M - Financial Assurance Rule 335.231-.233 and .235

***1. Does the owner/operator have financial assurance for the most recent closure and post closure cost estimates for all facilities (by July 6, 1982 - 40 CFR Part 265.140, .143 and .145) (See Note 3 page 6)? Yes ___ No ✓ N/A ___

***2. Does the owner/operator have liability coverage or preparations made for coverage (40 CFR 265.147) as follows:

a. Sudden accidental release coverage (by July 15, 1982)? Yes ___ No ✓ N/A ___

b. Non-sudden accidental occurrence for certain storage, treatment and disposal facilities (due by Jan. 16, ___83, 84, 85___)? Yes ___ No ✓ N/A ___

***(Changed 5/24/82, Note 3 added and Questions 1 and 2)

NOTE: 1. If the answers to any of the preceeding questions is no, if it is not explained in the attached copy of the corrective action letter sent to the facility, explain it in the comments sheet.

2. Additional Closure and Post Closure provisions in TDWR Rules are also applicable to the various facilities in addition to Closure - 335.211-.216 and Post Closure - 335.217-.220 as follows: Tanks - 335.265; Surface Impoundments - 335.286; Land Treatment - 335.327; Landfills - 335.344; Incinerators - 335.365; Thermal Processing - 335.385; Chemical Physical and Biological Processing - 335.405. Closure and Post Closure cost estimates for facilities are required by TAC 335.231-.233. Financial assurances for T.S.D. facilities are also required by TAC 335.235 (see also 40 CFR Part 265).

***3. Closure and post closure cost estimates should be updated annually using the annual Implicit Price Deflator for Gross National Product 335.232(c).

Checklist Facility
(attach. to correct checkli

Date 8/18/82

INDUSTRIAL SOLID WASTE

Reg./Permit No. 31832

Compliance Monitoring Inspection Report

COMMENTS SHEET

FIELD OPERATIONS

SECTION: A Paragraph: 2

No shipments of hazardous waste had occurred as of the inspection date.

SECTION: B Paragraph: 2

There is a raw material storage tank that has been out of use for about 2 years that contains hazardous tank bottoms. The wastewater treatment system and a small storage tank are used for processing hazardous waste. There is a pond/lagoon used for storage and processing of hazardous waste. None of these are mentioned on ~~their~~ the company's registration.

SECTION: Paragraph:

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INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report
Tanks Checklist (Rule 156.22.16.001-.007)
*335.261-.267

ENFORCEMENT AND FIELD OPERATIONS

Class of Waste (1)

Section A - General

1. Are tanks presently used to treat or store waste? Yes ✓ No ___

   a. If no, do not complete rest of form.

   **b. If yes, check tanks. (Describe type of tank and indicate underground, above ground, or on-ground in comments sheet) ~~Yes ___ No ___~~

   **c. Is there evidence that incompatible wastes have been placed in the tank? Yes ___ No ✓

   (1) If yes, explain in comments sheet.

   **d. Is there evidence of any ruptures, leaks or corrosion of the tank(s)? Yes ___ No ✓

   (1) If yes, explain in comments sheet.

2. Are there any uncovered tanks? Yes ✓ No ___

   a. If no, do not complete - e.

   **b. If yes, do they have 2 feet (60 cm) freeboard? Yes ✓ No ___

   or

   **c. A containment structure? (e.g. dike or trench) Yes ___ No ✓

   or

   **d. A drainage control system? Yes ✓ No ___

   **e. A diversion structure? (e.g. standby tank) (NOTE: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.) Yes ✓ No ___

3. Are any of the tanks continuous feed? Yes ✓ No ___

   **a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or bypass to a stand-by tank)? Yes ✓ No ___

Section B - Waste Analysis

1. Is the tank used to store one waste exclusively? Yes ✓ No ___

   a. If no, what are the different wastes stored in the tank?

N/A

*(Changed 2/5/82, Texas Administrative Code Section references added)
** Note checklist questions to be noted or completed during on-site inspection

b. Are waste analyses and trial treatment or storage tests done on these different wastes? N/A Yes___ No___

(1) If no, does he have written, documented information on similar storage or treatment of similar wastes? N/A Yes___ No___

c. Are there records available of these waste analyses in the operating record? N/A Yes___ No~~N/A~~

Section C - Inspections

1. Do the records indicate the owner/operator inspects, where present, the following at least daily:

a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage system)? Yes___ No✓

b. Monitoring equipment (e.g. pressure and temperature gages)? Yes___ No✓

c. Level of waste in each uncovered tank? Yes___ No✓

2. Do the records indicate the owner/operator inspects the following at least weekly;

a. Construction materials of tanks for corrosion or leaks? Yes___ No✓

b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage? Yes___ No✓

3. Is there a written inspection schedule (Rule 156.22.08.006)? *335.116 Yes___ No✓

a. If yes, is the schedule kept at the site? Yes___ No✓

b. If no for 3 or 3a, explain in the comments sheet.

4. Is there evidence of ignitable wastes placed in tanks? Yes___ No✓

a. If yes, do records indicate that they are treated, rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable? or N/A Yes___ No___

**b. Is the waste protected from sources of ignition? N/A Yes___ No___

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of ignition. or

c. Is the tank used solely for emergencies? Yes___ No✓

*(Changed 2/5/82, Texas Administrative Section Code referenced added)
**See Note on Page 9

5. Is there evidence of reactive wastes placed in tanks? Yes___ No V

a. If yes, do records indicate that they are treated rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of reactive? or N/A. Yes___ No___

**b. Is the waste protected from sources of reaction? N/A Yes___ No___

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of reaction. or

c. Is the tank used solely for emergencies? Yes___ No V

6. Do the records indicate that incompatible wastes are placed in the same tank? Yes___ No V

a. If yes, explain in the comments sheet.

7. If a waste is to be placed in a tank that previously held an incompatible waste do operating records indicate that the tank was washed? N/A Yes___ No___

a. If yes, describe washing procedures. N/A

b. Describe how it is possible for incompatible waste to be placed in the same tank. N/A

NOTE: If the answer to Section A 2b-e and 3a, Section B 1b(1) and 1c, and Section C 1a-c, 2a, and 2b was no, explain in comments sheet.

8. Describe tank(s) site and indicate plat map location(s) and designation(s). Also describe size and capacity of each tank: See Attachment B

*(Changed 2/5/82 Texas Administrative Code Section references added)
** See Note Page 9

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ENFORCE
FIELD OPERATIONS

Checklist Tanks
(attach. to correct checklist)

Date 8/18/92

INDUSTRIAL SOLID WASTE

Reg./Permit No. 31832

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: A Paragraph: 1. b.

~~The~~ One tank is an open top concrete tank which is above grade. It is the wastewater treatment system and it is equipped with bottom skimmers, surface skimmers, and an aerator. Another tank is a small (about 100 gal.) surface covered tank. The last tank is a closed raw material storage tank if hazardous tank bot

SECTION: C Paragraph: 3. b.

There is no written inspection schedule. This is a violation of Rule Nos. 335.116, 335.264, and 335.295 of the Texas Administrative Code Industrial Solid Waste Rules

SECTION: C Paragraph: 1. & 2.

~~No inspections are~~ ~~See above~~

There are no inspections conducted. ~~No~~ This is a violation of the rules mentioned above.

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report
Surface Impoundments Checklist (Rule 156.22.17.001-008) of Waste (
*335.281-.288

1. Are surface impoundments presently used to treat or store waste? Yes ✓ No ___

   a. If yes, inspect the impoundments.

**2. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? Yes ✓ No ___

**3. Is there evidence of overtopping of the dike? Yes ~~✓~~ No ✓

   a. If yes or if less than 2 feet, explain in comments sheet.

4. Containment system for dyked or dammed impoundments (Rule 156.22.17.003). *335.283

   **a. Does the earthen dike have a protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? Yes ✓ No ___

   b. If no, explain in comments sheet.

5. What wastes are treated or stored in the impoundment? ~~Creosote~~ bottom sediment sludge from the wastewater treatment system in the creosote wood preserving industry (K001)

6. Are waste analyses and trial tests conducted on these wastes (chemical processing of a different hazardous waste or method only)? ~~N/A~~ Yes ___ No ✓

   a. If not, does the owner/operator have written documented information on similar treatment of similar wastes? ~~N/A~~ Yes ___ No ✓

7. Is this information retained in the operating record? Yes ___ No ✓

8. Is the impoundment inspected daily to check freeboard level? Yes ___ No ✓

9. Is the impoundment, dikes and vegetation surrounding the dike inspected weekly to detect leaks, deterioration or failures? Yes ___ No ✓

*(Changed 2/5/82, Texas Administrative Code Section references added)
**See Note on Page 1

**a. Is there any evidence of seepage? Yes___ No ✓

(1) If Yes, explain in comments sheet.

10. Does the impoundment have a liner? Yes___ No ✓

a. If Yes, what type? N/A

b. If Yes, does it have a leachate collection and removal system? Yes___ No ✓

**11. Is there evidence of ignitable or reactive wastes placed in the impoundment? Yes___ No ✓

a. If Yes, explain in comments sheet.

or

b. Is the impoundment used solely for emergencies? Yes___ No ✓

**12. Is there evidence of incompatible wastes placed in the impoundment? Yes___ No ✓

13. Are monitor wells required for this site? (Refer to Rule 156.22.12.001-.005 - Ground Water Monitoring) *335.191-.195 Yes ✓ No ___

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81? Yes___ No ✓

NOTE 1: Attach Ground Water Monitoring Report if answer to question 13 is yes.
NOTE 2: If the answer is No for Nos. 6a, 7, 9, 9 and No. 13 after 11/19/81, explain in comments sheet. If the answer to No. 12 is yes, explain in comments sheet.

14. Describe impoundment(s) site and indicate plat map, location(s) and designation(s). Also describe each impoundment's dimensions and capacity (acre-feet): See Attachment B

*(Changed2/5/82 Texas Administrative Code Section references added)
**See Note on Page 1

Attachment A

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OCT 07 1980

ENFORCEMENT AND FIELD OPERATIONS

TEXAS DEPARTMENT OF WATER RESOURCES 10-10-80
NOTICE OF REGISTRATION
INDUSTRIAL SOLID WASTE GENERATION/DISPOSAL

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY DISPOSAL FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY CHAPTER 22, RULES OF THE TEXAS DEPARTMENT OF WATER RESOURCES.

DATE OF NOTICE: 10-01-80

REGISTRATION NUMBER: 31832

THIS NUMBER IS TO PROVIDE ACCESS TO STORED INFORMATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THIS NUMBER IN ANY CORRESPONDENCE OR REPORTS.

REGISTRATION DATE: 10-01-80

COMPANY NAME: LUFKIN CREOSOTING CO. INC.
MAILING ADDRESS: POB 1207

LUFKIN, TEXAS 75901
GENERATING SITE LOCATION: 1411 EAST LUFKIN AVE. LUFKIN, TEXAS 75901
PERSON IN CHARGE: DANNY VINES
PHONE: (713) 634-5075
NUMBER OF EMPLOYEES: 8-24
TDWR DISTRICT: 05

I. WASTE GENERATED:

	WASTES		CLASS	CODE	DISPOSITION
01	PLANT REFUSE, GENERAL MISC.		II	27976D	OFFSITE
02	CREOSOTE TANK BOTTOMS	(L)	I	151230	OFFSITE

II. SHIPPING/REPORTING: UNDER RULE 156.22.01.312(B)D OF THE TDWR, ISSUA OF SHIPPING-CONTROL TICKETS AND MONTHLY REPORTING ARE REQUIRED FOR OFF-SITE DISPOSAL OF THE FOLLOWING CLASS I WASTES LISTED IN PART I. THE SIGNED GREEN COPY OF THE SHIPPING-CONTROL TICKET MAY BE USED IN LIEU OF SUBMITTING MONTHLY SHIPMENT SUMMARY REPORTS. THE USE OF SHIPPING CONTROL TICKETS SHOULD BEGIN WITHIN THIRTY (30) DAYS AFTER RECEIPT OF THIS NOTICE FOR THE FOLLOWING WASTES:

02 151230 CREOSOTE TANK BOTTOMS

Checklist Surface Impnd.
(attach. to correct checklist)

Date 8/18/82

Reg./Permit No. 31832

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OCT 07 '82
ENFORCEMENT
FIELD OPERATIONS

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

COMMENTS SHEET

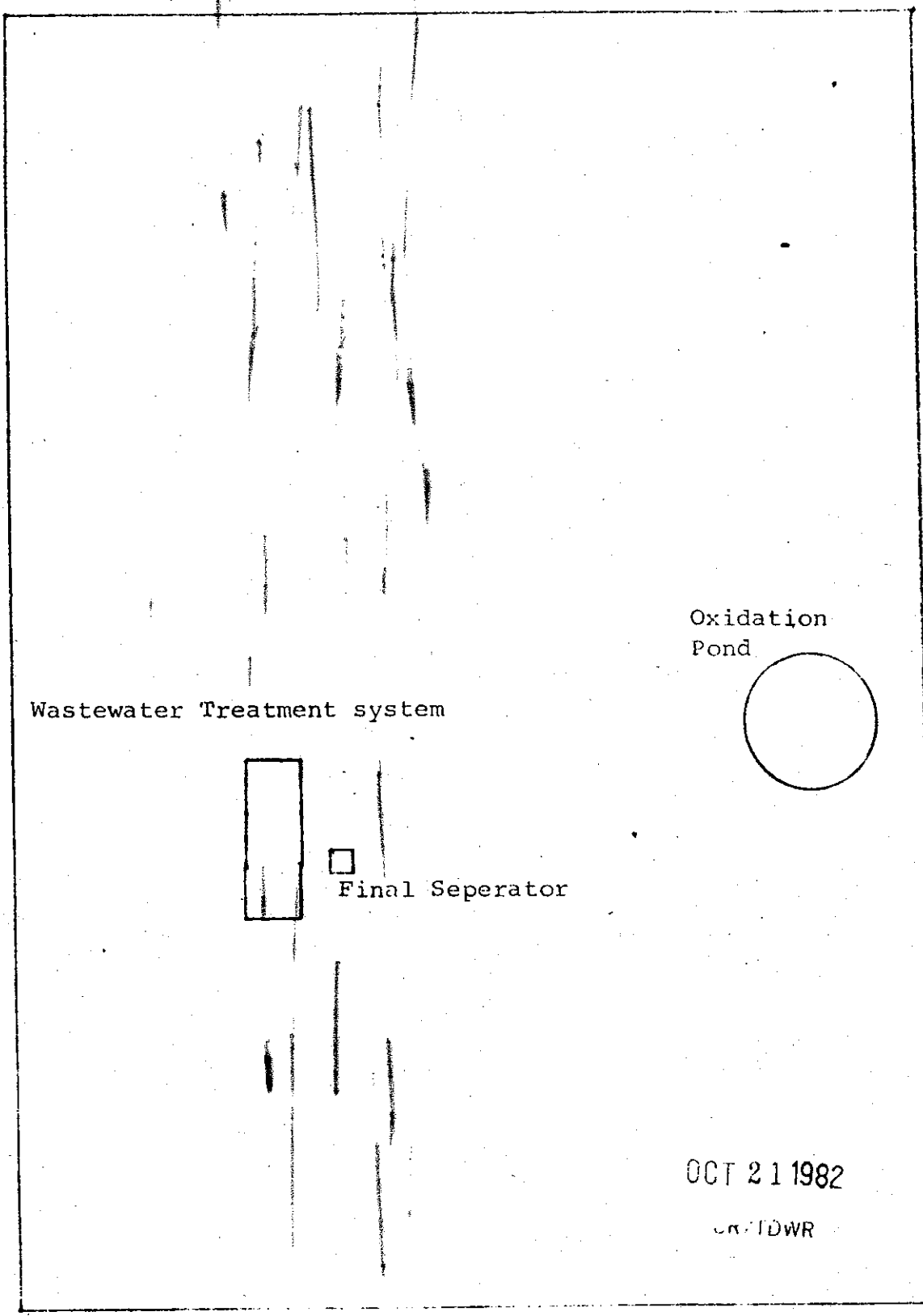
SECTION: _____ Paragraph: 6, 7, 8, 9

The owner/operator is in violation of TAC Industrial Solid Waste Rules.

SECTION: _____ Paragraph: _____

SECTION: _____ Paragraph: _____

Lufkin Creosoting Co., Inc.



OCT 21 1982

TDWR

(the other tank is at their original location at 1411 E. Lufkin Av

Last attached
9-29-82

7.	3-15-83	Letter (Robert G Fleming to Danny Vines) Re: Registration No 31832
8.	5-2-83	TDWR Memo (Tim Chaney to Gary Schroeder) Re Lufkin Creosoting Ind. Solid Waste Sample Analysis Results
9.	5-25-83	Telephone Memo re meeting to discuss RCRA violations
10.	6-7-83	Letter (Robert G Fleming to Danny Vines)
11.	7-28-83	Letter w/ Sample analysis & exhibits (Robert G Fleming to Danny Vines)
12.	11-28-83	Letter (Jimmy Alan Hall, Atty, TDWR to Danny Vines)

Lufkin Creosoting, Lufkin, TX
VI-408-H TXD008063661

File Index

1. 10-4-82 TDWR Industrial Solid Waste Disposal Compliance Monitoring Inspection Report

2. 9-29-82 TDWR Memo (Tim Chaney to Gary Schroeder) Subject: Lufkin Creosoting Co., Inc, Reg. No 31832 Annual Solid Waste Compliance Inspection

3. 12-10-82 Investigation Report - Memo - re: Enforcement Action - Lufkin Creosoting Co, Inc. (Harry D. Boudreaux to Gary Schroeder

4. 1-10-83 TDWR Telephone Memo (To: Tom Chaney from: Karen Macko)

5. 1-18-83 TDWR Memo (To: Enf. Coordinators from: Karen Macko) Re: Enforcement Notice - Lufkin Creosoting Co

6. 2-9-83 Memo -- TDWR -- (Robert G. Fleming to Susan Pleffman) Re: Request for Enf. Action

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. TXD008063661

I. NAME OF INSTALLATION — PERMIT

II. INSTALLATION MAILING ADDRESS — [redacted]

III. LOCATION OF INSTALLATION — [redacted]

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F TXD080636613 3 1 | APPROVED | DATE RECEIVED (yr., mo., & day): 800818 | 003217

I. NAME OF INSTALLATION

Lufkin Creosoting Company, Inc.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 P. O. Box 1207

CITY OR TOWN: 4 Lufkin, Texas | ST. | ZIP CODE: 75901

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 Hwy, 69 South

CITY OR TOWN: 6 Lufkin, Texas | ST. | ZIP CODE: 75901

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 Vines, Danny, Plant Superintendent | PHONE NO. *(area code & no.)*: 713 634-4923

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 Lufkin Creosoting Company, Inc.

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: F = FEDERAL, M = NON-FEDERAL — M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

AUG 18 1980

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

6 A E P

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

Please print or type with ELITE type (aracters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. TXD008063661

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS [redacted]

III. LOCATION OF INSTALLATION [redacted]

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUMBER: F TXD008063661 3 1

APPROVED / DATE RECEIVED (yr., mo., & day): 800818

003217

I. NAME OF INSTALLATION

Lufkin Creosoting Company, Inc.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 P. O. Box 1207

CITY OR TOWN: 4 Lufkin, Texas — ST — ZIP CODE: 75901

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 Hwy, 69 South

CITY OR TOWN: 6 Lufkin, Texas — ST — ZIP CODE: 75901

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): 2 Vines, Danny, Plant Superintendent

PHONE NO. (area code & no.): 713 634-4923

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 Lufkin Creosoting Company, Inc.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

[X] A. GENERATION
[ ] B. TRANSPORTATION *(complete item VII)*
[ ] C. TREAT/STORE/DISPOSE
[ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only — enter "X" in the appropriate box(es))*

[ ] A. AIR [ ] B. RAIL [ ] C. HIGHWAY [ ] D. WATER [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

AUG 18 1980

[X] A. FIRST NOTIFICATION
[ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

GAEP

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	T	X	D	0	0	8	0	6	3	6	6	1	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 0 1					
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 5 1					
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Danny Vines	Danny Vines, Plant Superintendent	8/15/80

DETACH A

TEXAS DEPARTMENT OF WATER RESOURCES 10-10-80
NOTICE OF REGISTRATION
INDUSTRIAL SOLID WASTE GENERATION/DISPOSAL

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY DISPOSAL FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY CHAPTER 22, RULES OF THE TEXAS DEPARTMENT OF WATER RESOURCES.

DATE OF NOTICE: 10-01-80

REGISTRATION NUMBER: 31832

THIS NUMBER IS TO PROVIDE ACCESS TO STORED INFORMATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THIS NUMBER IN ANY CORRESPONDENCE OR REPORTS.

REGISTRATION DATE: 10-01-80

COMPANY NAME: LUFKIN CREOSOTING CO. INC.
MAILING ADDRESS: POB 1207

LUFKIN, TEXAS 75901
GENERATING SITE LOCATION: 1411 EAST LUFKIN AVE. LUFKIN, TEXAS 75901
PERSON IN CHARGE: DANNY VINES
PHONE: ~~(713)~~ 634-5075
NUMBER OF EMPLOYEES: 8-24
TDWR DISTRICT: 05
CHANGE TO 409

I. WASTE GENERATED:

	WASTES	CLASS	CODE	DISPOSITION
01	PLANT REFUSE, GENERAL MISC.	II	27976D	OFFSITE
02	CREOSOTE TANK BOTTOMS	I	151230	OFFSITE
03	CREOSOTE PROCESS WATER SLUDGE SEDIMENT	I	951590	OFFSITE

ADD

II. SHIPPING/REPORTING. UNDER RULE 156.22.01.012(B) OF THE TDWR, ISSUANCE OF SHIPPING-CONTROL TICKETS AND MONTHLY REPORTING ARE REQUIRED FOR OFF-SITE DISPOSAL OF THE FOLLOWING CLASS I WASTES LISTED IN PART I. THE SIGNED GREEN COPY OF THE SHIPPING-CONTROL TICKET MAY BE USED IN LIEU OF SUBMITTING MONTHLY SHIPMENT SUMMARY REPORTS. THE USE OF SHIPPING CONTROL TICKETS SHOULD BEGIN WITHIN THIRTY (30) DAYS AFTER RECEIPT OF THIS NOTICE FOR THE FOLLOWING WASTES:

02 151230 CREOSOTE TANK BOTTOMS
03 951590 CREOSOTE PROCESS WATER SLUDGE SEDIMENT

ADD

NOTICE OF REGISTRATION (CONTINUED)

REGISTRATION NUMBER: 31832
COMPANY NAME: LUFKIN CREOSOTING CO. INC.

III. ON-SITE WASTE MANAGEMENT FACILITIES:
~~NONE IDENTIFIED~~ ADD

01 DRUM STORAGE AREA
02 PROCESS WATER RECYCLING UNIT *
03 MAKE-UP WATER TANK *

* REGISTRANT DOES NOT CONSIDER THESE FACILITIES TO BE WASTE MANAGEMENT FACILITIES BUT RATHER PROCESS UNITS.

File III
I. 2

Duplicate?

5/21/84

LUFKIN CREOSOTING COMPANY

EMERGENCY PROCEDURES MANUAL

PETROMAS INCORPORATED

8237 LOCKHEED

HOUSTON, TEXAS 77061

EMERGENCY PROCEDURES MANUAL

IMPLEMENTATION

This Emergency Procedure Manual is designed to instruct all personnel in what to do when an occurrence renders the facility unsafe or inoperable, or when an accident occurs involving extensive property damage, serious personal injury or death.

For this plan to function effectively, all personnel must be thoroughly familiar with the pertinent details. The Emergency Coordinator is responsible for implementing the program.

Employees must be thoroughly familiar with the locations and operation of the fire and emergency system, valves, switches and fire extinguishers and with all procedures contained herein. A review must be included in the orientation of new employees.

I. EMERGENCY COORDINATOR

At all times, there will be at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures. This emergency coordinator will be thoroughly familiar with all aspects of the facility, the location and characteristics of the waste handled, the location of all records within the facility and the facility layout. In addition, this person will have the authority to commit the resources needed to carry out the contingency plan. Danny Vines is the emergency coordinator for Lufkin Creosoting Company with Larry Perry as alternate. Their phone numbers and addresses are:

Danny Vines	634-2478 (home) 634-5075 (office) Rt. 4, Box 7730 Lufkin, TX 75901
Larry Perry	632-7105 (home) 634-5075 (office) Rt. 3, Box 488 A Lufkin, TX 75901

II. EMERGENCY PROCEDURES

A. Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) will immediately:

1. Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

2. Notify appropriate State or local agencies with designated roles if their help is needed.

B. Whenever there is a release, fire or explosion, the emergency coordinator will immediately identify the character, exact source, amount and a real extent of any released materials. He may do this by observation or review of facility records or if necessary, by chemical analysis.

Concurrently, the emergency coordinator will assess possible hazards to human health or the

environment that may result from release, fire or explosion. This assessment will consider both direct and indirect effects of the release, fire or explosion (e.g., effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

C. If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he will report his findings as follows:

1. If his assessment indicates that evacuation of local areas may be advisable, he will immediately notify appropriate local authorities. He will be available to help appropriate officials decide whether local areas should be evacuated; and

2. He will immediately notify the Texas Department of Water Resources as set out in Section .007 of the State of Texas Oil

and Hazardous Substances Spill Contingency Plan, revised April, 1978 (Attachment 1). The report will include the items set forth in Section I.(C). of the Contingency Plan for Lufkin Creosoting Company.

D. Other Requirements

1. During an emergency, the emergency coordinator will take all resonable measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other hazardous waste at the facility. These measures will include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

2. If the facility stops operations in response to a fire, explosion or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation, or rupture in valves, pipes, or other equipment, wherever this is appropriate.

3. Immediately after an emergency, the emergency coordinator will provide for storing, processing or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release, fire, or explosion at the facility.

4. The emergency coordinator will ensure that, in the affected area(s) of the facility:

   a. No waste that may be incompatible with the released material is stored, processed or disposed of until cleanup procedures are completed; and

   b. All emergency equipment listed in this plan is cleaned and fit for its intended use before operations are resumed.

5. The owner or operator will note in the operating record the time, date, and

details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he will submit a written report on the incident to the Department. The report will include:

a. Name, address and telephone number of the owner or operator;

b. Name, address and telephone number of the facility;

c. Date, time, and type of incident (e.g. fire, explosion);

d. Name and quantity of material(s) involved;

e. The extent of injuries, if any;

f. An assessment of actual or potential hazards to human health or the environment, where this is applicable, and;

EMERGENCY PROCEDURES MANUAL (Continued)

g. Estimated quantity and disposition of recovered material that resulted from the incident.

III. Required Equipment

The facility is equipped with the following:

A. Steam whistle alarm.

B. Telephone service capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams;

C. Portable fire extinguishers.

D. Water at adequate volume and pressure to supply water hose streams.

E. Two front end loaders (Cat 950) for spill control and damming.

F. Personnel protective equipment

1. All service canister masks
2. Rubber gloves
3. Chemical safety goggles
4. Rubber safety suits
5. Barrier cream

Note: All of the above equipment will be tested and maintained.

IV. Evacuation

Should an emergency situation be encountered where evacuation is necessary the Emergency Coordinator will be responsible for directing personnel.

Once the order is given, the evacuation should be in a quick orderly manner to avoid injury. The emergency coordinator shall search the area to determine that everyone has been evacuated.

EMERGENCY SITUATION

I. Spills

A. Possibilities:

1. Storage tank overfill or leak
2. Pipe rupture or leak
3. Pump leak
4. Recycling system leak

B. Actions

1. Immediately notify emergency coordinator.
2. Close valves to tanks being overfilled, if this can be accomplished without endangering the safety of personnel.
3. Shut down pumps.
4. Guard against sources of ignition.
5. Get fire equipment ready for use.

II. Fire

Should fire occur, the following actions are to be taken:

1. Activate steam whistle alarm.
2. Close valves and shut down pumps.
3. Extinguish with dry chemical fire extinguisher. (Note: Water may be ineffective.) All personnel shall be familiar with the location of fire extinguisher throughout the facility.
4. Follow orders of Emergency Coordinator.

III. Personal Injuries

In the event of personal injury of company personnel or outsider while on company property, the following procedures are applicable:

1. Render first aid within limits of ability of personnel present.

Symptoms of Creosote Exposure:

Vapors cause moderate irritation of nose and throat. Liquid causes severe burning of eyes and reddening and itching of skin. Prolonged contact with skin can cause burns. Ingestion causes salivation, respiratory difficulties, thready pulse, vertigo, headache, loss of pupillary reflexes, hypothermis, cyanosis and mild convulsions.

Treatment for Exposure:

INHALATION - Remove victim to fresh air if he/she is not breathing, give artificial respiration. If breathing is difficult, call ambulance.

EYES - Flush immediately with water for 15 minutes.

SKIN - Wipe with vegetable oil or margarine, then wash with soap and water.

INJECTION - Have victim drink water or milk: DO NOT INDUCE VOMITING.

III. Personal Injuries (Continued)

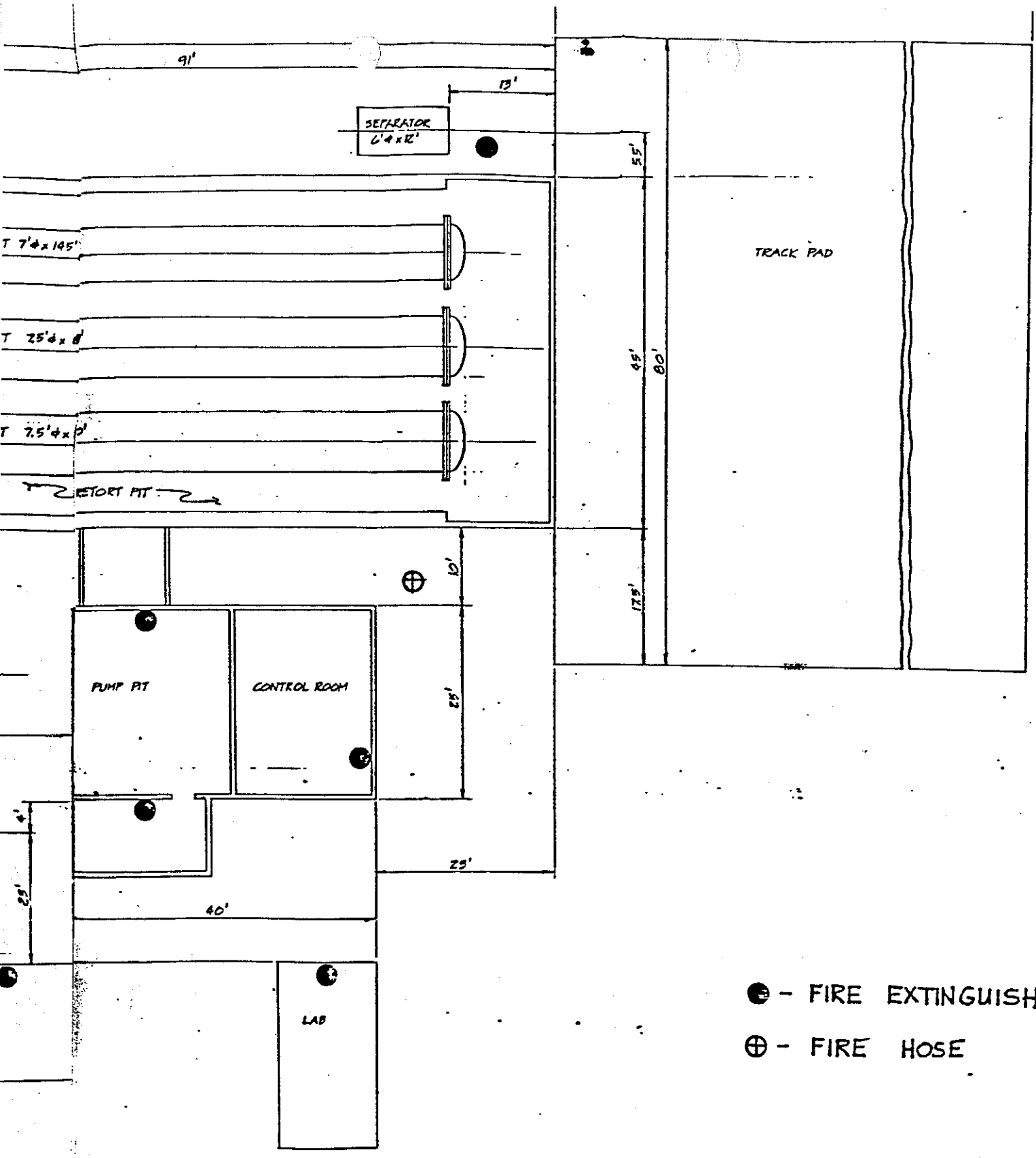
2. Immediately call emergency coordinator.

EMERGENCY PROCEDURES MANUAL (Continued)

Emergency Assistance List

Police	634-6611
Fire	634-3311
Ambulance	632-3030
Lufkin Memorial Hospital	634-8111 (Emergency)
Emergency Coordinator - Danny Vines	634-2478
Alternate - Larry Perry	632-7105

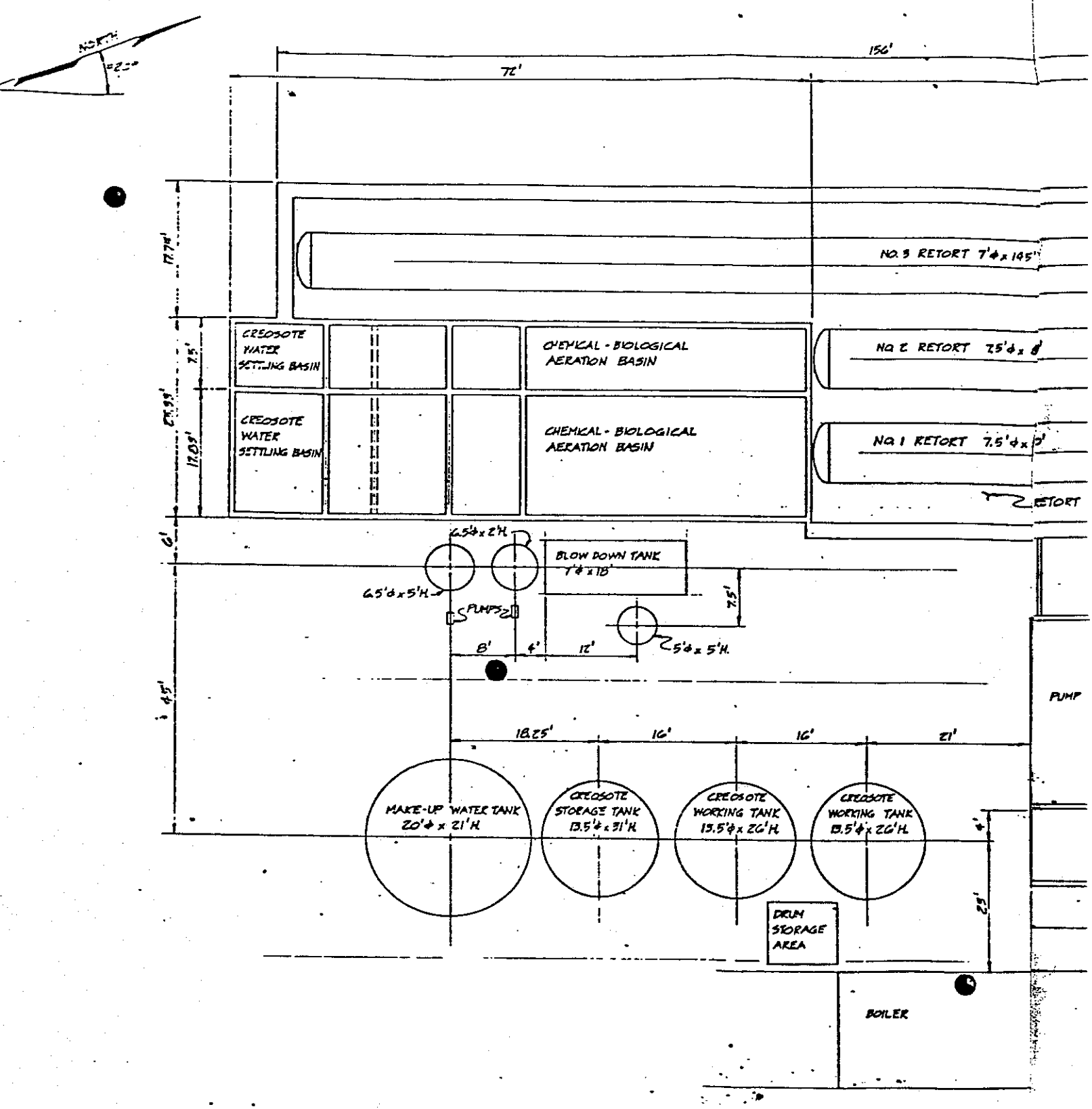
Emergency Equipment Types	Location and Physical Description	Outline of Capabilities
Fire Extinguishers	20 lb. A,B,C dry chemical type. (See facility layout for location)	For fires in ordinary combustible materials such as wood, cloth, paper, rubber and many plastics; fires in flammable liquids, gases and greases; fires which involve electrical equipment. Dry chemical forms non-conducting smothering film and prevents reflash.
Spill Containment	Two (2) - "Cat 950" front end loaders. Located on-site.	For spill containment and damming.
Safety suits, goggles, gloves and boots	Located in Control Room.	PVC material for protection against skin exposure to creosote.



	Name	Date
Drawn	KS	5-8-84
Checked	PJM	5-21-84
Proj Mgr.		
I. F. C		

Petromas Incorporated
ENGINEERING SERVICES
8735 Landmark Houston, Texas 77081 Ph:713 641-0591

Drawing Title: FACILITY LAYOUT
LUFKIN CREOSOTE COMPANY



Comm	Date	By	App	Insp	Revision	Comm	Date	By	App	Insp	Revision	Comm	Date	By	App

File - Permits II. 1.

Petromas Incorporated
Engineering & Construction Services
8237 Lockheed
Houston, Texas 77061 713-641-0691

Original to file
S Chatelaine
S/14184

Duplicate ?

May 10, 1984

Ms. Pamela Phillips
U.S. Environmental Protection Agency
1201 Elm Street
Dallas, TX 75270

Dear Ms. Phillips:

Attached is an amendment to the Hazardous Waste Permit Application Part A, Form 3, for Lufkin Creosoting Company.

The listing of the process code T03 was an error we have just recently discovered.

This amendment corrects the error and we would appreciate your inclusion of the amended page in the original Form 3 of the application.

We sincerely regret the error and appreciate your understanding.

Very truly yours,

J. B. Roach, P.E.
President

JBR/jv/135

cc: Ms. Karen Macko
Mr. Danny Vines

...or type in the unshaded areas only (...as are spaced for elite type, i.e., 12 characters/inch). AMMENDMENT

Form Approved OMB No. 158-S80004

EPA RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARD[O]US WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F | T X D 0 0 8 0 6 3 6 6 1 | T/A C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C: 8 | YR. 79 | MO. 06 | DAY 19 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR. | MO. | DAY — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. **PROCESS DESIGN CAPACITY** – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C | DUP | T/A C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 2	160,000	G		7				
2	T 0 1	164,000	G		8				
3	T 0 2	1.2	A		9				
4					10				

ntinued from the front.

PROCESSES *(continued)*

SPACE FOR ADDITIONAL PROCESS CODES OR ? DESCRIBING OTHER PROCESSES *(code "T04")* OR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

OTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by ore than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

XAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds er year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes e corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 00 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

TEXAS DEPARTMENT OF WATER RESOURCES
1700 N. Congress Avenue
Austin, Texas

TEXAS WATER DEVELOPMENT BOARD
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George W. McCleskey, Vice Chairman
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Executive Director

TEXAS WATER COMMISSION
Felix McDonald, Chairman
Lee B. M. Biggart
G. Ralph Roming

Karen Macko

November 28, 1983

Mr. Danny Vines
Lufkin Creosoting Company
P. O. Box 1207
Lufkin, Texas 75901

Dear Mr. Vines:

Re: Solid Waste Registration No. 31832

On July 13, 1983, the staff of the Texas Department of Water Resources met with representatives of Lufkin Creosoting Company to discuss the closure of the oxidation pond at your facility. A July 28, 1983 letter from Mr. Robert G. Fleming, Director, Enforcement and Field Operations Division addressed to you required Lufkin Creosoting Company to submit a comprehensive proposal for the closure of the pond by September 30, 1983.

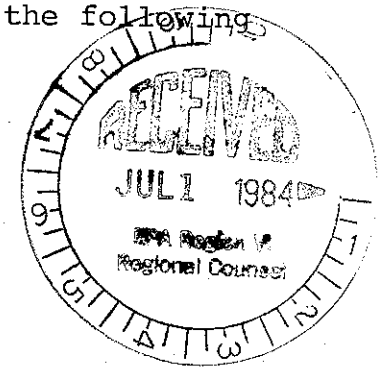
As of the date of this letter, the Texas Department of Water Resources has not received a proposal for the closure of the pond. Please submit this proposal or have your attorney contact Mr. Jimmy Alan Hall, Staff Attorney, Office of the General Counsel, at (512) 475-7851 immediately.

Sincerely yours,

Jimmy Alan Hall
Staff Attorney

cc: Karen Macko, Enforcement and Field Operations Division
TDWR District 6

FACILITY CLOSURE PLAN



In order to close the Lufkin Creosoting Facility the following items will have to be decontaminated;

1) Make-up Water Tank
2) Creosote Working Tanks (2)
3) Creosote Storage Tank
4) Process Water Recycling System
5) Blowdown Tank Systems
6) West Side Separator Tank
7) Retorts

The closure will be done in such a manner as to eliminate post-closure escape of hazardous waste, or any hazardous waste constituent. All residual hazardous waste will be hauled and disposed of by a licensed hazardous waste facility (those not processed through the treatment plant). The closure will be observed and certified by a licensed Professional Engineer.

The facility will be closed in the following manner:

I. DESCRIPTION OF CLOSURE

For closure purposes, it will be assumed that the facility has been stripped of all mechanical equipment. The pumps will be replaced so the facility can be restored to operating condition. Any liquid standing in the process water recycling system and those generated in the decontamination of the mechanical processing equipment will be processed through the facility.

Creosote inventory will be sold and waste sludge will be removed from the creosote working tanks and retorts. After

removal of sludge, all tanks and systems will be washed down (steamed) to remove any remaining hazardous waste constituents. All piping will be flushed and the generated liquid processed through the process water recycling system and the make-up water tank. Finally, sludge in the make-up water tank will be shipped for land disposal and this tank will also be steamed. The aqueous solutions will be sent to a deep-well disposal site. Once the facility decontamination has been completed, the machinery used to handle waste residues will be washed and steamed on a slab. All washwater will be hauled off site and deep-well injected.

II. WASTE INVENTORY AND DECONTAMINATION PROCESS

A. CREOSOTE WORKING TANKS (2)

Remove sludge and dispose off site:

Volume = 2(25 cy) = 50 cy

Cost removal, transportation and disposal:
($70/cy) = $3,500

B. CREOSOTE STORAGE TANK

Remove sludge and dispose off site:

Volume = 12 cy

Cost removal, transportation and disposal:
($70/cy) = $840

C. PROCESS WATER RECYCLING SYSTEM

1) Remove liquid and boil off in make-up water tank:

Volume = 95,000 GAL

Cost removal, transportation and disposal:
($0.042 GAL) = $3,990

2) Assume 6" of sludge on bottom:

Volume = 30 cy

Cost removal, transportation and disposal:
($70/cy) = $2,100

Sub Cost = $6,090

D. RETORTS

Assume 4" sludge in bottom:

Volume = 10 cy

Cost removal, transportation and disposal:
($70/cy) = $ 700

E. SEPARATOR TANK AND BLOWDOWN SYSTEM

1) Remove liquid and evaporate in make-up water tank

Volume = 7,000 GAL

Cost removal, transportation and disposal:
($0.042 GAL) = $ 295

2) Remove sludge and dispose off site:

Volume = 3 cy

Cost removal, transportation and disposal:
($70/cy) = $ 210

Sub Cost = $ 505

F. WASHWATER

All tanks, concrete pits and basins will be washed down to remove any remaining hazardous waste constituents. All pipes, sumps and concrete slab areas will also be flushed with this washwater. The construction equipment utilized will be decontaminated. The washwater will be evaporated.

Volume - 50,000 GAL

Cost removal, transportation and disposal: ($0.042/GAL) = $2,100

G. MAKE-UP WATER TANK

1) Remove liquid and deep-well inject off site:

Volume = 5,000 GAL (38,000 GAL balance to be evaporated)

Cost removal, transportation and disposal: ($0.20/GAL) = $1,000

Cost to evaporate = $1,600

2) Remove sludge and dispose off site:

Volume = 23 cy

Cost removal, transportation and disposal: ($70/cy) = $1,610

Sub Cost = $4,210

H. RENTAL OF PUMPS

Cost = $1,500

I. LAB COSTS

10 at $500 ea. = $5,000

J. LABOR AND SUPERVISION

1) Average cost labor (including overhead) = $6.50/hr.
$6.50/hr. x 400 man hours = $2,600

2) Professional engineer will periodically have to supervise closure and certify the same:

20 hrs./week x 3 weeks = 60 hrs.

Report and certification = 20 hrs.

80 hrs. x $35/hr. = 2,800

Sub Cost = $5,400

K. TOTAL

A.	Creosote working tanks (2)	$ 3,500
B.	Creosote storage tank	$ 840
C.	Process water recycling system	$ 6,090
D.	Retorts	$ 700
E.	Separator tanks and blowdown system	$ 505
F.	Washwater	$ 2,500
G.	Make-up water tank	$ 3,210
H.	Pump rentals	$ 1,500
I.	Lab costs	$ 5,000
J.	Labor and supervision	$ 5,400
	Sub Total	$29,845
	5% Contingency	$ 1,492
	Total	$31,337

III. SCHEDULE OF CLOSURE

There are no plans to close the facility since in normal maintenance of the equipment, it will last indefinitely. In the event of business economic concerns forcing closure of the facility, notice will be given to the TDWR 90 days before beginning closure.

IV. CERTIFICATION OF CLOSURE

At completion of closure, Lufkin Creosoting Company will submit to the Executive Director a signed certification that the facility has been closed in accordance with the specification in the approved closure plan.

That certification will be signed by a Lufkin Creosoting Company representative, and also by an independent registered professional engineer.

V. POST-CLOSURE PLAN

Since Lufkin Creosoting Company plans to remove all hazardous waste during closure, there will be no hazardous wastes remaining on site at completion of closure operations. At this point in time, the facility will no longer be subject to the requirements for post-closure care.